

October 15, 2020

The Hon. George L. Russell
United States District Court
101 West Lombard Street
Baltimore, Maryland 21201

Re: *United States v. Ivan Potts*, GLR-19-0318

Dear Judge Russell:

I am writing in anticipation of Ivan Potts' sentencing, scheduled for October 22, 2020, and to respectfully ask the Court to impose the agreed-upon sentence of 42 months pursuant to Rule 11(c)(1)(C). I write briefly to explain a few factors absent from the PSR that may be relevant to the Court:

First, Potts underwent a significant experience prior to his arrest that influenced who he is today. In 2015, Baltimore police officers from the Gun Trace Task Force assaulted Potts during an arrest and planted a gun on him. Potts was sentenced to eight years in prison for the gun charge and served two years before his case was overturned. After his wrongful conviction, Potts became a community advocate and worked with Out for Justice, a criminal justice reform organization in Baltimore. He advocated for legislation that would help compensate individuals who were wrongfully incarcerated. He used his traumatic experience to help enact positive change in the criminal justice system.

Second, Potts is actively participating in the Georgetown Prison Scholars Program at the Correctional Treatment Facility (CTF). This program allows inmates to enroll in Georgetown University courses, providing them with the opportunity to pursue higher education while incarcerated. As a teenager, Potts was unable to follow the typical path to higher education. The Prison Scholars Program has provided him with an opportunity to challenge himself and pursue a bachelor's degree. Once he secures his degree, Potts plans to explore a future career in real estate.

Finally, the past seven months Potts has spent incarcerated at CTF have been extremely difficult. As this Court knows, CTF suffered from a COVID-19 outbreak earlier this year. In response to the outbreak and the global pandemic, CTF has been operating on a modified lockdown status. Potts has spent months completely isolated from other inmates. For several weeks, he spent 23 hours a day locked in his single-person cell to prevent the spread of the virus. All programming and family visits have been halted. The conditions of confinement have changed significantly in response to the COVID-19 pandemic. These conditions have increased the severity of Potts' time at CTF.

For these reasons, among others, we respectfully ask this court to impose the agreed-upon sentence of 42 months.

Sincerely,

_____/s/_____
C. Justin Brown

cc: AUSA Matthew Dellabetta